

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

BLAKE DRAPER

on behalf of himself and
all others similarly situated,

Case No. 11-CV-535

Plaintiff,

vs.

CAPTEL, INC.

Defendant.

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT AND JOINT STIPULATION FOR CLASS CERTIFICATION**

The parties, by and through their undersigned counsel, hereby move the
Court for:

- (1) An order preliminarily approving the Settlement Agreement in this case
(attached as Exhibit 1 to this Motion);
- (2) An order granting the parties' joint stipulation to certify classes pursuant
to Fed. R. Civ. P. 23;
- (3) All other relief as set forth in the parties' Proposed Order for Preliminary
Approval.

For the reasons outlined in the memorandum of law filed herewith, the
parties believe the Settlement Agreement provides for a fair resolution of the
disputes between the parties, and respectfully request that the Court grant
preliminary approval of the settlement.

Dated this 11th day of May, 2012.

HAWKS QUINDEL, S.C.

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Dated this 11th day of May, 2012.

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